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Avery Landing Avery, ID - EPA Region X POLREP #4

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7/9/2012

On-Scene Coordinator - Earl Liverman, On-Scene Coordinator Non-Time-Critical - Removal Action

Pollution Report (POLREP) #4

Start Date: 5/29/2012



Refer to POLREP No. 1 for a discussion of Site conditions and background.

Current Activities

Site removal activities from 06/24/12 through 07/07/12 included:

Completed excavation of the eastern portion of the LNAPL plume area (approximately 10,000 square feet) to an approximate depth of 20 feet below ground surface, a depth EPA determined to be acceptable for the removal of contaminated materials. Collected post-excavation soil samples from the bottom and north and east

sidewalls of the excavation and submitted the samples for analysis as required by the FHWA 2012 Removal Action Work Plan. Continued excavation of the LNAPL plume from the Forest Highway 50 ROW (advancing toward the western portion of the plume) and transition areas, and continued evaluation of the effectiveness of field screening methods to determine the extent of excavation. Generally, the soil profile from approximately 0 to 10 feet below ground surface is considered not contamination and from approximately 10 feet to 20 feet below ground surface the subsurface soil is considered contaminated. Several test pits were excavated to guide the excavation effort. The soil profile described above was encountered in each test pit. Bunker C was encountered as free product near MW-11. Groundwater is consistently encountered at approximately 10 feet below ground surface.

- FHWA: As of 07/06/12, approximately 10,758 yd3 of clean overburden material has been excavated and set aside for reuse, and approximately 8,030 yds3 of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.
- FHWA/Bentcik Transition Area: As of 07/06/12, approximately 3,278 yd3 of clean overburden material has been excavated and set aside for reuse, and approximately 1,232 yds3 of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.
- FHWA/Potlatch Transition Area: As of 07/06/12, approximately 726 yd3 of clean overburden material has been excavated and set aside for reuse.
- On 06/20/12, soil samples were collected from the contaminated soil stockpile for expedited analytical testing to complete the waste disposal profile. Per Waste Management's requirements, 10 samples were collected from the first 2,000 cubic yards of contaminated soil and analyzed at an off-Site laboratory for polychlorinated biphenyls (PCBs), semivolatile organic compounds (SVOCs), volatile organic compounds (VOCs), and Toxicity Characteristic Leaching Procedure (TCLP) metals. The results indicated that all PCBs and VOCs were non-detect in all samples, and only a few TCLP metals were present at very low concentrations and well below regulatory limits. The results of the SVOC analyses indicated the presence of a few polycyclic aromatic hydrocarbons (PAHs) at concentrations less than 1 milligram per kilogram (mg/kg), which was expected considering the nature of the waste material (i.e., petroleum-contaminated soil). Overall, the results for the contaminated soil were as expected and the disposal facility confirmed that the waste was appropriate for their facility. Additionally, the disposal facility agreed that for future contaminated soil stockpile samples (at a rate of one per 5,000 yd3), only PCB and SVOC analyses were necessary and the VOCs and TCLP metals could be discontinued.
- · Received the Site Cultural Resources Pedestrian Survey Report prepared by Applied Archaeological Research, Inc. (AAR). AAR recommends that a cultural resource monitor observe any earthmoving or other ground-disturbing activities occurring in close proximity of five Features. The purpose of monitoring would be to ensure that potentially significant archaeological resources are not damaged or destroyed during cleanup activities.
- Started off-Site transportation and disposal of contaminated materials on 07/05/12. As of 07/06/12, approximately 418 tons of contaminated materials have been shipped off-Site. Transportation is provided by R Transport, Inc., George, WA, and the contaminated materials are being disposed of at the Waste Management Graham Road Recycling and Disposal Facility, Medical Lake, WA.
- Ongoing operation of the temporary water treatment system. As of 07/06/12, approximately 1,982,200 gallons of contaminated groundwater has been treated and discharged to the St. Joe River. Operational (effluent) samples were collected on 06/26/12 and 07/05/12 and were analyzed for the parameters of concern. Results have not yet been received. Five of the ten 20,000 gallon effluent holding tanks are being demobilized since the water treatment system has proven effective at achieving the discharge criteria.
- · Ongoing maintenance of the temporary bypass roadway.
- · Ongoing maintenance and evaluation of general construction BMPs.
- Ongoing daily routine air quality at three varying locations and surface water quality monitoring at four locations. To date, there have been no exceedances of applicable air and surface water regulatory criteria.

- Ongoing daily tailgate safety sessions discussing the project, potential hazards, required safety equipment, spill prevention and control BMPs, and anything else personnel should know.
- Continued evaluation of functional baseline project accounting and auditing arrangements and requirements for EPA, START, and ERRS due to multiple parties, settlement agreements, and funding mechanisms.
- Personnel on-Site: EPA 1; START 1; ERRS 18.

Planned Removal Actions

- Continue excavation of the LNAPL plume from the Forest Highway 50 road prism (advancing toward the western portion of the plume) and transition areas, and continue to evaluate the effectiveness of field screening methods to determine the extent of excavation.
- Begin reconstruction of Forest Highway 50 on 07/09/12.
- Ongoing operation of the temporary water treatment system to ensure it meets the required water quality discharge parameters.
- · Ongoing maintenance and evaluation of BMPs.
- · Ongoing routine air quality and surface water quality monitoring.

Next Steps

The next POLREP will be submitted on or about 21 July 2012, and thereafter on a approximate bi-weekly schedule.

Key Issues

Coordination of excavation and road building activities, particularly given the necessary sequence and dependency of cleanup and roadbuilding activities, presence of multiple contractors, and Site physical constraints.

Cost Information through 7/9/2012

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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